

January 31, 2013

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc., ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the Assignment of Licenses to Alaska Wireless Network, LLC
WT Docket No. 12-187 and WC Docket No. 09-197

Dear Ms. Dortch:

On January 1, 2013, Alaska Communications Systems Group, Inc. (“ACS”) undertook internal organizational changes pursuant to which it changed the business form of the ACS applicants in the above-captioned proceedings from corporations to limited liability companies. Thus, ACS Wireless License Sub, Inc. has become ACS Wireless License Sub, LLC, and ACS of Anchorage License Sub, Inc. has become ACS of Anchorage License Sub, LLC. Both entities are organized under the laws of the state of Alaska. This was not a substantial change; it involved no change in the beneficial ownership of ACS or either of the ACS applicants, and it is considered *pro forma* under the Commission’s rules. *See, e.g.*, 47 C.F.R. §§63.03(d) 63.24(d).¹ Nevertheless, ACS provides this notice to update the record in the above-captioned proceedings pursuant to Section 1.65(a) of the Commission’s rules, to ensure that the information contained in the above-captioned applications remains accurate. 47 C.F.R. §1.65(a).

¹ As the Commission has recognized, an assignment accomplished through a corporate reorganization “that involves no substantial change in the beneficial ownership of the corporation (including ... change in form of the business entity)” is presumptively classified as a *pro forma* transaction because it does not result in a change in the actual controlling party, and thus is “considered non-substantial.” 47 C.F.R. § 63.24 (d) and Note 2.

Marlene H. Dortch, Secretary
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Page 2 of 2

Please contact me with any questions concerning this matter.

Respectfully submitted,

/s/

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